Linda A. King State Bar # 087138
Law Offices of Linda A. King
2044 First Ave., Suite 200
San Diego, Ca 92101-2079
619) 233-8034 FAX (619) 233-4516

Attorney for Nuria Christina Ramirez

United States District Court

Southern District of California

United States of America, Plaintiff, vs. CARLOS SAAVEDRA, et al. Defendants	Case No.: 08MJ8065 – 08CR302 **MOTION FOR MATERIAL WITNESS VIDEOTAPED DEPOSITION** **DATE: February 22, 2008** **TIME: 10:00 am** **HON.: Magistrate Judge Peter C. Lewis**

TO UNITED STATES ATTORNEY KAREN HEWITT OR HER REPRESENTATIVE, CAROLINE HAN, AND MARK ADAMS AND FEDERAL DEFENDERS , ATTORNEYS FOR DEFENDANTS:

NOTICE IS HEREBY GIVEN that on February 22, 2008 at 10:00 am, or as soon thereafter as the matter may be heard, in the courtroom of Honorable Peter C. Lewis of this court, located at 2003 W. Adams Avenue, Suite 220, El Centro, CA 92243, Material Witness, Nuria Christina Ramirez, by and through her attorney of record, Linda A. King, will move the court for an order authorizing the videotaped deposition of the material witness.

The motion will be made on the grounds that there is good cause for the order requested in that the material witness knows of no sureties in this country who will bond her out of Immigration's Custody during the pendency of this matter. Neither the interests of justice nor the convenience of the parties and witnesses will be served by requiring the material witnesses to remain in Immigration Custody until the matter is concluded.

Dated this February 7, 2008

_s/ Linda A. King__
Linda A. King
Attorney for Material Witness